

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Michael Roy Greer

Debtor

Nationstar Mortgage LLC

Movant

vs.

Michael Roy Greer

Respondent

BK NO. 15-14483 REF

Chapter 13

Related to Document No. 6

Hearing Date: 11/05/15

**OBJECTION OF NATIONSTAR MORTGAGE LLC
TO CONFIRMATION OF CHAPTER 13 PLAN**

Nationstar Mortgage LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On August 26, 2015, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$16,316.11.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$16,316.11, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Nationstar Mortgage LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: September 8, 2015

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